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RUTHIA HE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUTHIA HE, A/K/A RUJIA HE, and  
DAVID BRODY,

Defendants.

CASE NO. 3:24-cr-00329-CRB

**DECLARATION OF KOREN BELL IN  
SUPPORT OF DEFENDANT'S MOTION  
FOR A BILL OF PARTICULARS**

Date: January 8, 2025  
Time: 1:30 PM  
Courtroom: Courtroom 6 – 17th Floor  
Judge: Hon. Charles R. Breyer

1 I, KOREN BELL, declare as follows:

2 1. I am a Partner at Willkie Farr & Gallagher LLP, and represent Defendant Ruthia  
3 He.

4 2. I submit this declaration in support of Defendant's Motion for a Bill of Particulars,  
5 filed with this Court on December 2, 2024.

6 3. I base this declaration on my own personal knowledge and on information obtained  
7 in the course of the above-captioned matter.

8 4. On November 5, 2024, Defendant met with the Government to discuss her need for  
9 particulars.

10 5. On November 11, 2024, Defendant served on the Government a letter requesting  
11 particulars pursuant to Federal Rule of Criminal Procedure 7(f). A true and correct copy of  
12 Defendant's November 11 letter is attached as **Exhibit A**.

13 6. On November 18, Defendant followed up on her November 11, requesting a  
14 response from the Government. A true and correct copy of Defendant's November 18  
15 correspondence is attached as **Exhibit B**.

16 7. On November 22, 2024, the Government served on the Defendant's a response to  
17 Defendant's November 11 letter. A true and correct copy of the Government's November 22 letter  
18 is attached as **Exhibit C**.

19 8. On November 26, Defendant requested from the Government its proposed  
20 scheduling order. A true and correct copy of the Defendant's correspondence is attached as  
21 **Exhibit D**.

22 9. On November 27, 2024, the Government emailed counsel for Defendant a proposed  
23 scheduling order. A true and correct copy of the Government's email and proposed scheduling  
24 order is attached as **Exhibit E**.

25 10. On November 27, 2024, counsel for Defendant emailed the Government in  
26 response to its proposed scheduling order. A true and correct copy of counsel for Defendant's  
27 email and attachment is attached as **Exhibit F**.

1           11.     On December 2, 2024, counsel the Government and counsel for Ms. He exchanged  
2 further emails relating to the proposed trial schedule. A true and correct copy of those email  
3 exchanges is attached as **Exhibit G**.

4           12.     To date, the Government has produced large amounts of discovery in this case,  
5 totaling over 11 million pages of documents (*excluding* those from the Government's most recent  
6 productions, which are still being loaded into our database), and 6,005 gigabytes of data. Based  
7 on the discovery produced so far and the information received, the Government has interviewed  
8 over 130 witnesses, and there have been nearly 200 Done clinicians who have treated over 150,000  
9 patients, potentially placing at issue hundreds-of-thousands of prescriptions, if not more.

10           I certify under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing  
11 is true and correct.

12  
13 Dated: December 2, 2024

WILLKIE FARR & GALLAGHER LLP

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15 By: /s/ Koren Bell  
16 Koren Bell

17 Attorneys for Defendant  
18 RUTHIA HE  
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